

TITLE: Cover letter to Additional Exhibit to 1d2
Original Complaint 5:23-cv-00656
ChatGPT Transcript Exhibit submitted 12/26/2023

Submitted by: Jurgis Adomavicius
Jurgis Adomavicius
12/26/23

500 Mountain Sunset Lane
Cary, NC 27519
December 26, 2023

FILED

DEC 27 2023

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC
BY MLB DEP CLK

Clerk of Court
PO Box 25670
Raleigh NC 27611
(delivered in person not mailed)

RE: CASE # 5:23-CV-00656

Dear Sir:

Please find attached an additional exhibit to my complaint against International Business Machines filed 11/16/2023. In that filing I included a number of exhibits, and one in particular (Exhibit #5) was a one page diagram to assist in understanding the segmentation created by IBM in its own published Summary Plan documents that led to the discrimination allegation and EEOC charge.

That Exhibit #5 only summarizes the mechanism but not the total complaint topic. I found the complexity of Medicare, Medicare Advantage vs Gap, HRA and ERISA all made this hard to easily summarize to family members.

I respectfully submit the attached ChatGPT transcript of a session with the AI product executed on 12/23/2023 with the assistance of my son Kyle Adomavicius.

I do not intend to make any statement about The Court's position on AI tools like ChatGPT.

I merely wish to share what I received as input for recommended actions from this product, as my resources are limited as a pro se litigant.

On pages 6 through 9 of the attachment, there are listed several requirements to support a complaint such as mine. Many of those I have addressed through the complaint exhibits.

On pages 11-12 is the following exchange, which I find to be an appropriate analogy and easy example to help explain this topic to friends and family:

>>> start of extract from attachment

okay help me explain this whole thing to a 5 year old

Alright, let's imagine you have a big box of crayons (IBM). Every day, you're allowed to use a few crayons (health benefits) to draw pictures. One day, the person in charge of the crayons (IBM's management) decides to change the rules. Now, they say you can only use certain colors unless you agree to use a smaller box they chose for you. If you don't agree, you can't use any of the special crayons (HRA funds) you were promised for being good at drawing.

You feel this isn't fair because you were told before that you could use any crayons you wanted when you got older. So, you decide to tell a teacher (the court) that the crayon rules should go back to how they

were. You think the new rules aren't nice, especially to the older kids (retirees) who have been drawing pictures for a very long time.

Now, you're looking in the school's rulebook (ERISA laws) and talking to other kids (other retirees and legal experts) to show the teacher why the new crayon rules aren't fair. You're hoping the teacher will understand and help make things right, so everyone can use their crayons happily again.

>>> end of extract from attachment

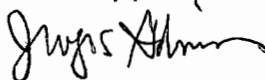
I do not wish to suggest for a moment that this analogy is a requirement for The Court or Counsel for the Defendant.

However, I believe this is a fair and accurate analogy to my complaint and requested outcome.

I just want, as an outcome, "the old rules back", or an action that at least that delivers that equivalent capability for myself.

Thanks for your attention to this complaint.

Sincerely yours,




Jurgis Adomavicius

Date: 12/26/23

I, Kyle Adomavicius, sign here that the attached ChatGPT session is presented in its unaltered entirety and was captured on December 23, 2023 with my participation.

Name: Kyle Adomavicius

Sig: 

Date: 12/26/23